

{In Archive} Fw: Clarification re: need for CORMIX modeling by TOPS

Patrick Rankin to: Brian Mueller 03/18/2009 05:05 PM

Bcc: Rob Lawrence

From: Patrick Rankin/R6/USEPA/US

To: Brian Mueller/R6/USEPA/US@EPA,

Bcc: Rob Lawrence/R6/USEPA/US

Archive: This message is being viewed in an archive.

Brian.

You likely understood Scott's reasoning already, but just in case....

Pat

----- Forwarded by Patrick Rankin/R6/USEPA/US on 03/18/2009 05:01 PM -----

Re: Fw: Clarification re: need for CORMIX modeling by TOPS

Js Wilson to: Patrick Rankin 03/18/2009 02:21 PM

Plenty foggy some days. Great work environment though.

The 403(c) stuff depends on the specifics of the facility, and as you note, the mixing zone associated issues. It is a localized environmental factor that could add to the impacts of whatever discharges are permitted and should be addressed in the 403(c) analysis.

Scott Wilson, Energy Coordinator Industrial Permits Branch (4203M) Office of Wastewater Management U.S. Environmental Protection Agency 1200 Pennsylvania Ave., NW Washington, DC 20460 202-564-6087

Patrick Rankin Hi Scott, I hope you're enjoying Foggy Bottom. I i... 03/18/2009 12:29:46 PM

From: Patrick Rankin/R6/USEPA/US
To: Js Wilson/DC/USEPA/US@EPA

Date: 03/18/2009 12:29 PM

Subject: Re: Fw: Clarification re: need for CORMIX modeling by TOPS

Hi Scott,

I hope you're enjoying Foggy Bottom. I imagine it provides an entertaining work environment these days.

I agree modeling of discharges from vessels calling at an offshore facility would provide information for consideration under NEPA, but you have me wondering how it might be used in 403(c) analysis. CWA 403(c) and the criteria are directed at the discharge for which an NPDES permit has been sought. What am I missing? Is it because they may impinge on a facility discharge's mixing zone, thus altering effects of the regulated discharge?.

Re: Fw: Clarification re: need for CORMIX modeling by TOPS

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Cc: Brian Mueller. Patrick Rankin. Rob Lawrence. Willie Lane

Hi Maria,

I hope all is good there. If possible, I would like to see the document they attached to the email so I can understand their side of the issue better. However, my guess is that if hydrostatic test water was modeled for the LOOP permit, it really should be done for this case too. I'm not entirely sure what other discharges the facility would have. Could you also confirm whether "carrier cooling water" is cooling water from ships carrying crude or not? Since I think TOPS would be located more than three miles offshore, discharges incidental to the normal operations if ships would not be something regulated under the NPDES permit. It probably would be something that should be looked at in the overall analysis of the effects of the facility under NEPA and Ocean Discharge Criteria though.

03/18/2009 08:43 AM

Scott Wilson, Energy Coordinator Industrial Permits Branch (4203M) Office of Wastewater Management U.S. Environmental Protection Agency 1200 Pennsylvania Ave., NW Washington, DC 20460 202-564-6087

Js Wilson to: Maria Okpala

Maria Okpala Scott, 03/18/2009 09:03:21 AM

From: Maria Okpala/R6/USEPA/US
To: Js Wilson/DC/USEPA/US@EPA

Cc: Brian Mueller/R6/USEPA/US@EPA, Willie Lane/R6/USEPA/US@EPA, Rob

Lawrence/R6/USEPA/US@EPA, Patrick Rankin/R6/USEPA/US@EPA

Date: 03/18/2009 09:03 AM

Subject: Fw: Clarification re: need for CORMIX modeling by TOPS

Scott,

Good morning. We were informed that you had conversation with a Texas Offshore Port System(TOPS) representative that CORMIX modeling would not be required as part of their NPDES application. TOPS is pushing back on not performing this modeling based on the conversation you had with them. LOOP, a similar facility, performed this modeling and were re-issued an NPDES/LPDES permit last year. Can you clarify on this? Thanks!

Maria Okpala
NPDES Permits Branch - Permits & Technical Section
EPA, Region 6 - Dallas, TX
okpala.maria@Epa.gov

Phone: 214 665-3152 Fax: 214 665-2191



Re: Fw: Clarification re: need for CORMIX modeling by TOPS



Rob Lawrence to: Patrick Rankin

03/17/2009 05:51 PM

Cc: Brian Mueller, Maria Okpala, Willie Lane

Not yet. When the company pushed back on the Coast Guard a couple of weeks ago, it was noted that LOOP had recently done the modeling and there was no good reason not to perform the modeling. especially since it is a new permitte.

Patrick Rankin

---- Original Message -----From: Patrick Rankin

Sent: 03/17/2009 05:31 PM CDT

To: Rob Lawrence

Cc: Brian Mueller; Maria Okpala; Willie Lane

Subject: Re: Fw: Clarification re: need for CORMIX modeling by TOPS

Has anybody asked Scott?

Fw: Clarification re: need for CORMIX modeling by TOPS



Fw: Clarification re: need for CORMIX modeling by TOPS

Maria Okpala, Willie Lane, Brian Rob Lawrence to: Mueller

03/17/2009 02:05 PM

Cc: Patrick Rankin

Maria, Brian and Willie - TOPS is still contending that they do not need to run CORMIX for their NPDES permit application. It seems that they are basing their position on a conversation with Scott last fall. I would point out that nothing in the attached "record of conversation" says anything about CORMIX.

If it is true that LOOP recent NPDES permit re-issuance including the modeling, I do not see why TOPS would not also need to carry out the modeling. The company has cited LOOP as the type of facility they are proposing off Houston.

The Coast Guard would like to hold a conference call with TOPS and their support contractor on this topic. Are you available tomorrow afternoon, Thursday morning or any time on Friday?

Rob Lawrence Senior Policy Advisor - Energy Issues

lawrence.rob@epa.gov

214.665.6580 (Desk)

---- Forwarded by Rob Lawrence/R6/USEPA/US on 03/17/2009 01:58 PM -----



FW: Clarification re: need for CORMIX modeling

McKitrick, Bradley to: Rob Lawrence

03/17/2009 01:54 PM

Sent by: Bradley.K.McKitrick@uscg.mil

Cc: "Martin, Raymond"

Hi Rob,

As per our short phone conversation, TOPS is questioning the need to do run CORMIX for the NPDES permit. They are citing a call with Scott Wilson (EPA). The text is capture in the attached doc and further discussed in the email below.

If possible I would like to have a conf call with EPA and TOPS to resolve this issue.

Regards,

Brad

Bradley K. McKitrick Environmental Protection Specialist US Coast Guard (CG-5225) Deepwater Ports Standards Division Phone (202) 372-1443

From: Silva, Tony [mailto:Tony.Silva@aecom.com]

Sent: Monday, March 16, 2009 3:43 PM

To: Cain, Peter

Cc: Hollingsworth, Jamey

Subject: Clarification re: need for CORMIX modeling

Peter,

As we discussed early today, I believe there is still and outstanding question regarding the requirement for CORMIX modeling. During last Wednesday's conference call it was indicated that the CORMIX modeling would be required in support of the NPDES permit application for the project based on discussions with EPA.

Prior to developing the NPDES application (last September), I had a brief discussion regarding NPDES permitting with Scott Wilson of EPA, who is the EPA Region 6 water permitting contact (see attached telecon). I discussed the discharges that would be included in the NPDES application, indicating that

they would include operational discharges from the platforms and construction phase hydrostatic test water discharges to federal waters. There was no indication during our call that crude carrier cooling water discharges would be included in the NPDES permit. EPA did find that the NPDES application submitted in support of the project was administratively complete, although they did reserve the right to request additional information once they have performed a formal technical review.

Platform discharges are all relatively small quantity flows and should not require CORMIX modeling to support their impact evaluation. It may well be that EPA is looking for CORMIX modeling of a representative crude carrier cooling water discharge in support of the overall project evaluation, but we should confirm this point. I think that perhaps a brief conference call with Brad McKitrick (USCG) might clarify the CORMIX modeling request issue. It might be appropriate to also include Elizabeth Dolezal (NRG) in on the discussion, but we can see what Brad wants to do with this initial discussion.

Thanks for your help with this.

regards,

tony silva

Anthony L. Silva, P.E.

Senior Environmental Engineer

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[attachment "EPA NPDES Call Summ 091708.pdf" deleted by Patrick

Rankin/R6/USEPA/US]